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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	Chapter 11
	:	
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:	Case No.: 09-50026 (REG)
f/k/a General Motors Corp., <i>et al.</i>	:	
	:	
Debtors.	:	(Jointly Administered)
	:	
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**NOTICE OF MATTERS SCHEDULED FOR  
HEARING ON FEBRUARY 17, 2015 AT 9:00 A.M. (EASTERN TIME)<sup>1</sup>**

Location of Hearing: United States Bankruptcy Court for the Southern District of New York,  
Alexander Hamilton U.S. Custom House, before the Honorable Robert E.  
Gerber, United States Bankruptcy Judge, Courtroom 523, One Bowling  
Green, New York, NY 10004-1408.

<sup>1</sup> The hearing on February 17, 2015 will begin at 9:00 a.m. and will conclude no later than 3:15 p.m. To the extent the hearing is not concluded by 3:15 p.m. on February 17, 2015, the hearing will resume on February 18, 2015 at 9:00 a.m. The Courthouse will open no earlier than 8:00 a.m. on February 17, 2015 and February 18, 2015.

**I. CONTESTED MATTERS**

1. Oral argument regarding the Four Threshold Issues (as defined in the Court's July 11, 2014 Supplemental Scheduling Order) concerning General Motors LLC's Motions to Enforce the Sale Order and Injunction.
  - A. Opening Brief by General Motors LLC on Threshold Issues Concerning its Motions to Enforce the Sale Order and Injunction (related document(s) 12807, 12808, 12620), filed by Arthur Jay Steinberg on behalf of General Motors LLC (**ECF 12981**).
  - B. Appendix of Exhibits for Opening Brief by General Motors LLC on Threshold Issues Concerning its Motions to Enforce the Sale Order and Injunction (related document(s) 12981), filed by Arthur Jay Steinberg on behalf of General Motors LLC (**ECF 12982**).
  - C. The Participating Unitholders' and GUC Trust Administrator's Opening Memorandum of Law Respecting the Equitable Mootness Threshold Issue (related document(s) 12981), filed by Daniel H. Golden on behalf of Participating Unitholders, Wilmington Trust Company (**ECF 12983**).
  - D. Declaration of Deborah J. Newman in Support of the Participating Unitholders' and GUC Trust Administrator's Opening Memorandum of Law Respecting the Equitable Mootness Threshold Issue, filed by Daniel H. Golden on behalf of Participating Unitholders, Wilmington Trust Company (**ECF 12984**).
  - E. Responsive Brief of Designated Counsel for Pre-Closing Accident Plaintiffs on Threshold Issues Concerning New GM's Motions to Enforce the Sale Order and Injunction (related document(s) 12807), filed by William P. Weintraub on behalf of Ignition Switch Plaintiffs in Pre-Closing Accident Lawsuits (**ECF 13021**).
  - F. Response by General Motors LLC Regarding the Equitable Mootness Threshold Issue (related document(s) 12983), filed by Arthur Jay Steinberg on behalf General Motors LLC (**ECF 13024**).
  - G. Designated Counsel's Opposition to New GM's Motions for Enforcement of Sale Order and Injunction (related document(s) 12981), filed by Edward S. Weisfelner on behalf of Plaintiffs (**ECF 13025**).
  - H. Declaration of Edward S. Weisfelner in Support of Designated Counsel's Opposition to New GM's Motions for Enforcement of Sale Order and

Injunction (related document(s) 13025), filed by Edward S. Weisfelner on behalf of Plaintiffs (**ECF 13026**).

- I. Declaration of Steve W. Berman in Support of Designated Counsel's Opposition to New GM's Motions for Enforcement of Sale Order and Injunction (related document(s) 13025), filed by Edward S. Weisfelner on behalf of Plaintiffs (**ECF 13027**).
- J. The Groman Plaintiffs' Response to That Part of New GM's Opening Brief Regarding the "Fraud on the Court Legal Standard" (related document(s) 13023, 12981, 13022), filed by Jonathan L. Flaxer on behalf of Groman, *et al.* Plaintiffs (**ECF 13028**).
- K. Designated Counsel's Response to the Participating Unitholders' and GUC Trust Administrator's Opening Memorandum of Law Respecting the Equitable Mootness Threshold Issue (related document(s) 12983), filed by Edward S. Weisfelner on behalf of Plaintiffs (**ECF 13029**).
- L. Response of GUC Trust Administrator and Participating Unitholders to New GM's Opening Brief on Threshold Issues Concerning Its Motions to Enforce the Sale Order and Injunction (related document(s) 12981), filed by Lisa H. Rubin on behalf of Wilmington Trust Company (**ECF 13030**).
- M. Declaration of Lisa H. Rubin, Esq. (related document(s) 13030), filed by Lisa H. Rubin on behalf of Wilmington Trust Company (**ECF 13031**).
- N. Corrected Exhibit 14 to the Declaration of Lisa Rubin, Esq. (related document(s) 13031), filed by Lisa H. Rubin on behalf of Wilmington Trust Company (**ECF 13032**).
- O. The Participating Unitholders' and GUC Trust Administrator's Reply Memorandum of Law Respecting the Equitable Mootness Threshold Issue (related document(s) 12983, 12984, 13029, 13024), filed by Daniel H. Golden on behalf of Participating Unitholders, Wilmington Trust Company (**ECF 13047**).
- P. Reply Brief by General Motors LLC on Threshold Issues Concerning its Motions to Enforce the Sale Order and Injunction (related document(s) 13030, 13028, 13021, 13025), filed by Arthur Jay Steinberg on behalf of General Motors LLC (**ECF 13048**).
- Q. Appendix of Exhibits to Reply Brief by General Motors LLC on Threshold Issues Concerning its Motions to Enforce the Sale Order and Injunction

(related document(s) 13048), filed by Arthur Jay Steinberg on behalf of General Motors LLC (**ECF 13049**).

Additional Documents

- A. Adversary case 14-01929. Complaint against General Motors LLC, filed by Jonathan L. Flaxer on behalf of Steven Groman, *et al.* Plaintiffs (**ECF 12619**).
- B. Motion of General Motors LLC Pursuant To 11 U.S.C. §§ 105 And 363 To Enforce the Sale Order And Injunction (“Motion to Enforce”), filed by Arthur Jay Steinberg on behalf of General Motors LLC (**ECF 12620, 12621**).
- C. Objection to Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce The Court’s July 5, 2009 Sale Order and Injunction (related document(s) 12620), filed by Edward S. Weisfelner on behalf of Plaintiffs (**ECF 12629**).
- D. Cover Page and Exhibits to objection to motion of General Motors LLC pursuant to 11 U.S.C. §§ 105 and 363 to enforce The Courts July 5, 2009 Sale Order and injunction [Docket No. 12629], filed by Edward S. Weisfelner on behalf of Plaintiffs (**ECF 12640**).
- E. Scheduling Order Signed on May 16, 2014 Regarding (I) Motion to Enforce (II) Objection Filed By Certain Plaintiffs in Respect Thereto, and (III) Adversary Proceeding No. 14-01929 (**ECF 12697**).
- F. Amended Complaint against General Motors LLC /First Amended Class Action Complaint in Adv. Proceeding No. 14-01929, filed by Jonathan L. Flaxer on behalf of Steven Groman, *et al.* Plaintiffs (**ECF 12706**).
- G. Supplemental Scheduling Order Signed by The Honorable Robert E. Gerber on July 11, 2014 Regarding (I) Motion to Enforce, (II) Objection Filed by Certain Plaintiffs in Respect Thereto and (III) Adversary Proceeding No. 14-01929 (**ECF 12770**).
- H. Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce This Court’s July 5, 2009 Sale Order And Injunction Against Plaintiffs In Pre-Closing Accident Lawsuits (“Pre-Closing Accident Lawsuits Motion to Enforce”), filed by Arthur Jay Steinberg on behalf of General Motors LLC (**ECF 12807**).
- I. Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 To Enforce This Court’s July 5, 2009 Sale Order And Injunction (Monetary Relief Actions, Other Than Ignition Switch Actions) (“Monetary Relief”).

Actions Motion to Enforce”), filed by Arthur Jay Steinberg on behalf of General Motors LLC (**ECF 12808**).

- J. Endorsed Order Signed by The Honorable Robert E. Gerber on August 4, 2014 Regarding Letter to The Honorable Robert E. Gerber by General Motors LLC Regarding Proposed Page Limits for Briefs (**ECF 12810**).
- K. Agreed and Disputed Stipulations of Fact Pursuant to the Court’s Supplemental Scheduling Order, Dated July 11, 2014, filed by Arthur Jay Steinberg on behalf of General Motors LLC (**ECF 12826**).
- L. Objection filed by Joshua Paul Davis on behalf of Dori Powledge (**ECF 12847**).
- M. Endorsed Order Signed on August 22, 2014 Regarding Letter to The Honorable Robert E. Gerber Regarding Briefing Schedule for the Four Threshold Issues (**ECF 12869**).
- N. Scheduling Order Signed on September 15, 2014 Regarding Pre-Closing Accident Lawsuits Motion to Enforce (**ECF 12897**).
- O. Scheduling Order Signed on September 15, 2014 Regarding Monetary Relief Actions Motion to Enforce (**ECF 12898**).
- P. Notice of Submission of Proposed Additional Agreed and Disputed Stipulations of Fact in Connection with Court's Scheduling Order Regarding Pre-Closing Accident Lawsuits Motion to Enforce (related document(s) 12826), filed by William P. Weintraub on behalf of Ignition Switch Plaintiffs in Pre-Closing Accident Lawsuits (**ECF 12977**).
- Q. Letter to Judge Gerber by S. Preston Ricardo, Esq., regarding request for leave to file attached response to part of GM's Opening Brief (related document(s) 12981), filed by Jonathan L. Flaxer on behalf of Groman, *et al.* Plaintiffs (**ECF 13022**).
- R. Endorsed Order Signed on December 16, 2014 Regarding Letter to Judge Gerber by S. Preston Ricardo, Esq., Regarding Request for Leave to File Response (related document(s) 13022) (**ECF 13023**).
- S. Administrative Order Signed on January 13, 2015 Regarding Oral Argument and Related Matters (**ECF 13044**).
- T. Letter to Judge Gerber by Jonathan L. Flaxer, Esq., regarding request to reserve right to address Court at the Motion to Enforce Hearing (related

document(s) 13044), filed by Jonathan L. Flaxer on behalf of Groman, *et al.* Plaintiffs (**ECF 13056**).

- U. Letter to the Honorable Judge Robert E. Gerber Pursuant to January 13, 2015 Administrative Order Regarding Oral Argument and Related Matters, filed by Arthur Jay Steinberg on behalf of General Motors LLC (**ECF 13057**).
- V. Endorsed Order Signed on January 28, 2015 Regarding the “Fraud on the Court” Issue, the Matter Address in the Groman Plaintiffs’ Brief (**ECF 13058**).
- W. Endorsed Order Signed on January 28, 2015 Regarding Overall Time Requests and Proposed Sequence of Oral Argument (**ECF 13059**).
- X. Letter to the Honorable Judge E. Gerber Pursuant to January 28, 2015 Endorsed Order Regarding Oral Argument and Related Matters (related document(s) 13059), filed by Scott I. Davidson on behalf of General Motors LLC (**ECF 13064**).
- Y. Endorsed Order Signed on January 30, 2015 Regarding Letter to the Honorable Judge Robert E. Gerber Pursuant to January 28, 2015 Endorsed Order Regarding Oral Argument and Related Matters (**ECF 13066**).
- Z. Letter to the Honorable Judge Robert E. Gerber In accordance with the Court’s Administrative Order, entered on January 13, 2015 [Dkt. 13044], First Endorsed Order, entered on January 28, 2015 [Dkt. 13059], and Second Endorsed Order, entered on January 30, 2015 [Dkt. 13066] (related document(s) 13059, 13044, 13066), filed by Mark P. Robinson Jr. on behalf of The People of the State of California, acting by and through Orange County District Attorney Tony Rackauckas (**ECF 13072**).
- AA. Response to Letter, dated February 2, 2015, Submitted by the State of California Regarding Oral Argument [Dkt. No. 13072] (related document(s) 13072), filed by Arthur Jay Steinberg on behalf of General Motors LLC (**ECF 13073**).
- BB. Letter to the Honorable Judge E. Gerber Regarding Oral Argument and Related Matters (related document(s) 13064, 13059), filed by Scott I. Davidson on behalf of General Motors LLC (**ECF 13075**).
- CC. Endorsed Order Signed on February 9, 2015 Regarding Letter Filed by Mark P. Robinson Jr. on behalf of The People of the State of California, acting by and through Orange County District Attorney Tony Rackauckas (**ECF 13078**).

Status: This matter is going forward.

Dated: February 13, 2015  
New York, New York

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